

ESTTA Tracking number: **ESTTA436207**

Filing date: **10/17/2011**

IN THE UNITED STATES PATENT AND TRADEMARK OFFICE
BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD

Proceeding	91200486
Party	Plaintiff Minnesota Twins, LLC
Correspondence Address	CARISSA L ALDEN COWAN LIEBOWITZ LATMAN PC 1133 AVENUE OF THE AMERICAS NEW YORK, NY 10036 UNITED STATES cla@cll.com, jmn@cll.com, trademark@cll.com
Submission	Motion to Suspend for Settlement Discussions
Filer's Name	Aryn M. Emert
Filer's e-mail	ame@cll.com, jmn@cll.com, trademark@cll.com
Signature	/Aryn M. Emert/
Date	10/17/2011
Attachments	111017 - MOCS - 3 Months (Twins-Brown) - progress.PDF (3 pages)(24499 bytes)

IN THE UNITED STATES PATENT AND TRADEMARK OFFICE
BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD

In re Application Serial No. 77/316,949
Filed: October 30, 2007
For Mark: TWINS
Published in the Official Gazette: January 4, 2011

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MINNESOTA TWINS, LLC,	:	
Opposer,	:	Opposition No. 91200486
	:	
v.	:	
	:	
RONALD ETIENNE BROWN,	:	
Applicant.	:	
	:	
-----	X	

**MOTION ON CONSENT TO CONTINUE SUSPENSION
AND TO EXTEND DISCOVERY PERIOD IF OPPOSITION IS RESUMED**

Opposer, by and through counsel, hereby moves for an order further suspending the proceedings in this matter for a period of three (3) months, until **January 15, 2012**. Applicant's counsel consented to this motion, which is requested to allow the parties to continue to engage in settlement discussions.

Progress has been made towards settlement in this matter. The parties' counsel discussed potential terms of settlement and Opposer's outside counsel relayed Applicant's proposed settlement terms to Opposer's in-house counsel, who is in charge of the matter, for consideration. The additional time is requested to allow Opposer's in-house counsel to consider Applicant's proposed settlement terms, and for the parties to continue to explore a settlement of this matter.

In the event that the Board denies this motion, Opposer consents to an extension of time for Applicant to file an answer or otherwise respond to the Notice of Opposition until sixty (60) days after such denial.

If the Board grants this motion, the Board should also reset Applicant's time to answer or otherwise respond to the Notice of Opposition. Additionally, the parties request that six months of discovery be allowed and that the discovery cutoff be reset to six (6) months after the proceedings resume so that the parties will have the full period of discovery in the event that the matter is not able to be resolved. The trial periods and other periods should be reset accordingly.

Dated: New York, New York
October 17, 2011

Respectfully submitted,

COWAN LIEBOWITZ & LATMAN, P.C.
Attorneys for Opposer

By: /Aryn M. Emert/

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that, on October 17, 2011, I caused a true and correct copy of the foregoing Motion to Suspend to be sent via First Class Mail, postage prepaid, to Applicant's Correspondent and Attorney of Record, Edward S. Wright, Law Offices of Edward S. Wright, 1100 Alma St Ste 207, Menlo Park, CA 94025-3344.

/Aryn M. Emert/
Aryn M. Emert